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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Nicole Lawtone-Bowles

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Write the full name of each plaintiff.

\_\_\_\_ CV \_\_\_\_  
(Include case number if one has been  
assigned)

-against-

Liberty University

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Liberty University School of Health Sciences et.al.

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Brendan Haynie

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Grant M. Rost

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Write the full name of each defendant. If you need more  
space, please write "see attached" in the space above and  
attach an additional sheet of paper with the full list of  
names. The names listed above must be identical to those  
contained in Section II.

**COMPLAINT**

Do you want a jury trial?

☒ Yes ☐ No

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

This action arises under, inter alia, 20 U.S.C. § 1681, which prohibits educational

discrimination on the basis of disability, sex and race accordingly, this Court has subject  
(relating to federal question jurisdiction) and 28 U.S.C. § 1333(a)(3) (relating to equal right

This Court has personal jurisdiction over Defendant Liberty University online education e

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Nicole Lawtone-Bowles, is a citizen of the State of  
(Plaintiff's name)

New York State

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of

N/A.

If more than one plaintiff is named in the complaint, attach additional pages providing  
information for each additional plaintiff.

If the defendant is an individual:

The defendant, Liberty University, is a citizen of the State of  
(Defendant's name)

Virginia

or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of

N/A.

If the defendant is a corporation:

The defendant, University, is incorporated under the laws of  
the State of Virginia

and has its principal place of business in the State of Virginia

or is incorporated under the laws of (foreign state) N/A

and has its principal place of business in Virginia.

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

Nicole	Lawtone-Bowles	
First Name	Middle Initial	Last Name
<u>56 Center Street</u>		
Street Address		
<u>Orange, Highland Falls</u>		
County, City	State	Zip Code
<u>(347)538-5386</u>	<u>nicolelawtone@aol.com</u>	
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<div>Liberty University</div> <hr/> <div> <div>First Name</div> <div>Last Name</div> </div> <div>Education</div> <hr/> <div>Current Job Title (or other identifying information)</div> <div>1971 University Blvd</div> <hr/> <div>Current Work Address (or other address where defendant may be served)</div> <div> <div>Campbell, Lynchburg</div> <div>VA</div> <div>24515</div> </div> <hr/> <div> <div>County, City</div> <div>State</div> <div>Zip Code</div> </div>
Defendant 2:	<div>Liberty University School of Health Sciences</div> <hr/> <div> <div>First Name</div> <div>Last Name</div> </div> <div>Health Sciences</div> <hr/> <div>Current Job Title (or other identifying information)</div> <div>1971 University Blvd</div> <hr/> <div>Current Work Address (or other address where defendant may be served)</div> <div> <div>Campbell, Lynchburg</div> <div>VA</div> <div>24515</div> </div> <hr/> <div> <div>County, City</div> <div>State</div> <div>Zip Code</div> </div>
Defendant 3:	<div>Brendan Haynie</div> <hr/> <div> <div>First Name</div> <div>Last Name</div> </div> <div>Online Chair, School of Health Sciences</div> <hr/> <div>Current Job Title (or other identifying information)</div> <div>1971 University Blvd</div> <hr/> <div>Current Work Address (or other address where defendant may be served)</div> <div> <div>Campbell, Lynchburg</div> <div>VA</div> <div>24515</div> </div> <hr/> <div> <div>County, City</div> <div>State</div> <div>Zip Code</div> </div>

Defendant 4: Grant M. Rost

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First Name	Last Name	
Associate Professor of Law		

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Current Job Title (or other identifying information)

1971 University Blvd

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Current Work Address (or other address where defendant may be served)

Campbell, Lynchburg	VA	24515
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County, City	State	Zip Code
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### III. STATEMENT OF CLAIM

Place(s) of occurrence: Highland Falls, West Point, New York

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Date(s) of occurrence: May 9, 2021 to Present

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#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

I started at Liberty University School of Law in Summer 2021 and graduated in December 2021 with my Juris master's degree with a 3.0. In Fall 2021, the Doctor of Philosophy in Health Sciences (Ph.D.) was designed by instructors from the School of Health Sciences. That instructor creates the course they teach in each class listed in the degree plan. I decided to stay at Liberty University to complete my (Ph.D.) I decided I would work the entire Spring of 2022 and Summer of 2022 on the core courses. I passed all my courses with a B- or better except for HSCI 725, HSCI 730, HSCI 815 and HSCI 820 I was accepted into Omega Nu Lambda National Honor Society Liberty University Honor Society Alpha Chapter, which was a privilege in April 2022. Let me give you a little background about myself. I dropped out of college 25 years ago to become a truck driver to raise my two sons and take care of my family of three as a single mother. In March of 2019, I started the union-free college program to complete my associate degree. Today I now hold two Associates degrees., one bachelor's degree, and one master's degree. On December 4, 2021, I completed my goal on my 50th birthday to obtain my master's degree. This means that I am more up to date on Online learning and teaching with Blackboard, Canvas, and Turnitin because I have been to college in this decade. The Doctor of Philosophy in Health Sciences (Ph.D.) instructors got their degrees decades ago and are not up to date on APA 7, AMA 11, and Bluebook 21st edition. When Dr. Jonathan Giles, Administrative Dean, School of Health Sciences, graded me in outdated APA, I became livid and upset because I was writing my papers correctly in APA 7 and Bluebook 21 when he graded me in APA format when he received his degree. In going over my entire education here at Liberty University School of Law, I was graded on an.

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ancient Bluebook form. One of my associate degrees and my bachelor's degrees are in legal studies. When I complained in an email to the School of Law, School of Health Sciences, and Online Writing Center about what was going on, I did not realize it sent out a mass email to all the teachers of each program. Grant M. Rost, Associate Professor of Law, sent me a disturbing email that I found disgusting as a Liberty University School of Law professor to a student. Dr. Brendan Haynie, Online Chair, School of Health Sciences, refuses to give me a phone or zoom appointment to discuss my concerns so I can show them what I mean because it's hard to explain your concerns in an email without visuals. I was then attacked when I voiced my concerns to Dr. Richard Goodrich, who does not have a degree in Ph.D. but a D.O. and is a surgeon who only taught undergraduates in his graded practices. I was further berated in emails and comments on my Rubrics. I filed a complaint asking my chair committee to grade my work because I trust their grading practices, and I was giving Dr. Cynthia Williams, whose comments further insulted me and who does not know APA7, AMA 11, or the discussion content she was grading, until I got an F in HSCI 730. Dr. Robert Bonser, who teaches HSCI 725, where I was an A student, accused me of tier III academic dishonesty of plagiarism on Final Paper

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#### **INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I incurred financial losses totaling so far \$300,000.00 in on campus fees even though I am online student. Emotional Stress to the point that I am paying for a counselor to keep my mental health intact. \$100,000 in programs and online tutor fees to help me get through college because of my disability. I was also denied access to the Juris Doctor Degree Program online as per my American Disabilities Request for Liberty University School of Law. Not to mention the mental stress of repeating and paying the same instructors for courses I should have got a B- in the first time. Also subjected to white supremacy statements from instructors.

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#### **IV. RELIEF**

State briefly what money damages or other relief you want the court to order.

I want to be able to finish Doctor of Philosophy in Health Sciences (Ph.D.), I want my record cleared of all false Tier III violations and refunds for all courses I forced to repeat because I was not allowed a phone or zoom meeting to defend myself in my Beacon Complaints. I also want 20 million dollars for pain and suffering. I also need 10 million dollars to start my own educational program for disadvantage youths in my community. So they can learn how to do college work in early education. All court and attorney fees as needed.

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**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

July 6, 2022		<i>Nicole Lawtone-Bowles</i>	
Dated		Plaintiff's Signature	
Nicole		Lawtone-Bowles	
First Name	Middle Initial	Last Name	
56 Center Street			
Street Address			
Orange, Highland Falls	NY	10928	
County, City	State	Zip Code	
(347) 538-5386	nicolelawtone@aol.com		
Telephone Number	Email Address (if available)		

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes    ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**United States District Court  
Southern District of New York**

## **Pro Se (Nonprisoner) Consent to Receive Documents Electronically**

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER<sup>1</sup> at [www.pacer.uscourts.gov](http://www.pacer.uscourts.gov) or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one “free look” at the document by clicking on the hyperlinked document number in the e-mail.<sup>2</sup> Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first “free look” or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the “free look” to avoid future charges.*

### **IMPORTANT NOTICE**

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court’s Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your “free look” and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.<sup>3</sup>

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<sup>1</sup> Public Access to Court Electronic Records (PACER) ([www.pacer.uscourts.gov](http://www.pacer.uscourts.gov)) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

<sup>2</sup> You must review the Court’s actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

<sup>3</sup> The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk’s Office at the Court.



## CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

### Civil case(s) filed in the Southern District of New York:

**Note:** This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Lawtone Bowles vs The City of New York et al

16-CV-4240 (AJN) (OTW) 18-CV-4338 (AJN) (OTW)

Lawtone-Bowles, Nicole

Name (Last, First, MI)			
56 Center Street		Highland Falls	
Address	City	State	Zip Code
(347)538-5386		nicolelawtone@aol.com	
Telephone Number		E-mail Address	
July 6, 2022		<i>Nicole Lawtone-Bowles</i>	
Date		Signature	

### Return completed form to:

Pro Se Intake Unit (Room 200)  
500 Pearl Street  
New York, NY 10007